

EXHIBIT 8

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

- - - - - x
MAXIMILIAN KLEIN, et al., :
on behalf of themselves :
and all others similarly :
situated, :
Plaintiffs, :
v. : Case No.
META PLATFORMS, INC., a : 3:20-cv-08570-JD
Delaware Corporation :
headquartered in :
California, :
Defendant. :

- - - - - x
Videotaped Deposition of JOSHUA GANS, Ph.D.
Conducted virtually via Zoom
Tuesday, September 26, 2023
10:11 a.m. EST

Job No.: 503845
Pages: 1 - 337
Reported by: THERESA A. VORKAPIC,
CSR, RMR, CRR, RPR

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3 Videotaped deposition of Joshua Gans, Ph.D.,
4 conducted virtually via Zoom, pursuant to notice
5 before Theresa A. Vorkapic, a Certified Shorthand
6 Reporter, Registered Merit Reporter, Certified
7 Realtime Reporter, Registered Professional
8 Reporter and a Notary Public in and for the State
9 of Illinois.
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A P P E A R A N C E S

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1	Q You don't think any of the challenged	12:19:03
2	conduct allowed Meta to offer better data	12:19:05
3	targeting in its advertisements?	12:19:07
4	MS. GHITA: Objection to form.	12:19:11
5	BY THE WITNESS:	12:19:12
6	A I think all of the challenged conduct may	12:19:12
7	well have allowed that.	12:19:14
8	BY MR. GRINGER:	12:19:24
9	Q You understand that all ads served by Meta	12:19:26
10	are part of the social advertising market?	12:19:28
11	A I have not done any analysis where all ads	12:19:37
12	are part of the social advertising market because	12:19:40
13	I have not, for instance, analyzed the number of	12:19:44
14	people who are on Facebook, for instance, who have	12:19:47
15	no friends.	12:19:54
16	Q Are ads that target purely on age and	12:19:57
17	location data on social connections between users?	12:20:00
18	MS. GHITA: Objection to form.	12:20:04
19	THE WITNESS: Just a second. You might	12:20:08
20	have to repeat. I got a message that I wasn't	12:20:09
21	being loud enough, that I've been lulled into too	12:20:11
22	soft a voice. I'll move my microphone closer.	12:20:17
23	Can you repeat that question?	12:20:22
24	BY MR. GRINGER:	12:20:23
25	Q Where did you get the message that you	12:20:23

Transcript of Joshua Gans, Ph.D.
Conducted on September 26, 2023

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1	weren't being loud enough?	12:20:24
2	A I was on the chat here from Michelle.	12:20:25
3	MR. GRINGER: Michelle, please make sure	12:20:34
4	your posts to the witness are visible to everyone.	12:20:37
5	BY MR. GRINGER:	
6	Q Are ads that target purely on age and	12:20:48
7	location ads that use data on social connections	12:20:50
8	between users?	12:20:53
9	MS. GHITA: Objection to form.	12:20:54
10	BY THE WITNESS:	12:20:55
11	A No.	12:20:56
12	MR. GRINGER: We've been going for an	12:21:01
13	hour. Would it be a good time to break?	12:21:03
14	MS. GHITA: Dr. Gans, are you wanting to	12:21:06
15	take a lunch break now or just a short break?	12:21:07
16	It's 12:20 Eastern.	12:21:11
17	MR. GRINGER: Let's go off the record so	12:21:13
18	we don't have to discuss lunch preferences on the	12:21:16
19	record.	12:21:18
20	THE VIDEOGRAPHER: We are going off the	12:21:18
21	record. The time is now 12:21 p.m.	12:21:20
22	(A lunch recess was had from 12:21 p.m. to	
23	1:09 p.m. EST)	12:21:25
24		
25		

Transcript of Joshua Gans, Ph.D.
Conducted on September 26, 2023

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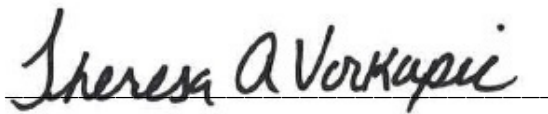
1	A F T E R N O O N S E S S I O N	13:09:51
2	THE VIDEOGRAPHER: We're going back on the	13:09:51
3	record. The time is now 1:09 p.m. Please	13:09:52
4	continue.	13:09:55
5	JOSHUA GANS,	
6	called as a witness herein, having been previously	
7	duly sworn and having testified, was examined and	
8	testified further as follows:	
9	EXAMINATION (Resumed)	13:10:02
10	BY MR. GRINGER:	13:10:02
11	Q Professor Gans, in your view is it	13:10:02
12	possible to answer the question of whether the	13:10:05
13	challenged conduct caused a common impact on the	13:10:07
14	putative class using empirical economic analysis?	13:10:12
15	MS. GHITA: Objection to form.	13:10:19
16	BY THE WITNESS:	13:10:27
17	A If you take my definition of empirical	13:10:28
18	that I outlined to you earlier, then what we	13:10:31
19	regard as empirical evidence is what we would	13:10:36
20	regard as evidence, evidence that was found by a	13:10:39
21	factfinder or evidence that was contained in	13:10:43
22	documents or evidence that required the analysis	13:10:45
23	of data. We use the economic lens to guide us	13:10:47
24	into the assumptions and other things that we	13:10:56
25	would use to draw inferences from, but ultimately	13:10:59

CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

I, Theresa A. Vorkapic, Certified
Shorthand Reporter No. 084-2589, CSR, RMR, CRR,
RPR, and a Notary Public in and for the County of
Kane, State of Illinois, the officer before whom
the foregoing deposition was taken, do hereby
certify that the foregoing transcript is a true
and correct record of the testimony given; that
said testimony was taken by me and thereafter
reduced to typewriting under my direction; that
reading and signing was not requested; and that I
am neither counsel for, related to, nor employed
by any of the parties to this case and have no
interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my
hand and affixed my notarial seal this 29th day of
March, 2023.

My commission expires November 6, 2023.



THERESA A. VORKAPIC

NOTARY PUBLIC IN AND FOR ILLINOIS